

EXHIBIT B

EEOC Charge

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To:

Agency(ies) Charge No(s):

FEPA
 EEOC

410-2022-07827

and EEOC

State or local Agency, if any

Name (Indicate Mr., Ms., Mrs.)

Ms. Jada Taylor

Home Phone (Incl. Area Code)
[REDACTED]-6756

Date of Birth
[REDACTED] 1995

Street Address

City, State and ZIP Code

[REDACTED] Manor Court SW Atlanta, Georgia 30331

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two are named, list under PARTICULARS below.)

Name

Athena Health

No. Employees, Members
200

Phone No. (Incl. Area Code)
(207) 323-7935

Street Address

City, State and ZIP Code

3 Hatley Road Belfast, Maine 04915

Name

US EEOC ATDO RECEIVED 07-22-2022

No. Employees, Members

Phone No. (Incl. Area Code)

Street Address

City, State and ZIP Code

DISCRIMINATION BASED ON (Check appropriate box(es).)

RACE

COLOR

SEX

RELIGION

NATIONAL ORIGIN

DATE(S) DISCRIMINATION TOOK PLACE

Earliest

Latest

01/25/2022

6/03/2022

RETALIATION

AGE

DISABILITY

GENETIC INFORMATION

OTHER (Specify)

CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

I. I was hired by Athena Health on January 12, 2021, as a Complex Issue Resolution Analyst. In or about October 2021, I was diagnosed with generalized anxiety disorder and depression. At my therapist Aloha McGregor's direction, I requested medical accommodations, specifically that: (a) I would be allowed longer break periods during the day; (b) could start the workday later or end it earlier, as needed due to the effects of my anxiety and depression on my life and for medical appointments for my treatment; and (c) could schedule days off as necessary. In addition, I requested and was given intermittent FMLA medical leave related to my generalized anxiety disorder and/or depression symptoms. Athena Health approved my intermittent FMLA medical leave request on or about January 25, 2022. I took intermittent FMLA leave related to my anxiety and depression symptoms during the period January 2022 through the end of May 2022.

II. In early May 2022, I was diagnosed with an unrelated medical condition and needed surgery on or about May 31, 2022. Upon my return to work on June 3, 2022, Athena Health monitored my performance and stated I did not meet performance criteria and terminated me. I believe I was terminated as I took FMLA leave, and/or was disabled, or perceived as disabled.

III. I believe that I was discriminated against based upon an actual and/or perceived disability, and for engaging in protected activity, in violation of the Americans with Disabilities Act.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY - When necessary for State or Local Agency Requirements

I declare under penalty of perjury that the above is true and correct.

7/26/2022

Date


Charging Party Signature

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWEORN TO BEFORE ME THIS DATE
(month, day, year)

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NOTARY – When necessary for State or Local Agency Requirements

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I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

7/20/2022 Jack D. Johnson
Date Charging Party Signature

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month, day, year)

EEOC Form 5 (11/09)

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Street Address Manor Court SW Atlanta, Georgia 30331		City, State and ZIP Code EEOC RECEIVED 2022-08-09																										
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THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): <p>I. I was hired by Athena Health on January 12, 2021, as a Complex Issue Resolution Analyst. Athena Health hired six individuals for this role in or about January 2021, of which two, including myself, an African-American, were Persons of Color and the remaining four employees were Caucasian. In addition, other, subsequent groups of hiring also included significantly less Persons of Color than Caucasians among the new employees.</p> <p>II. During the following year-and-a-half neither myself or the other Person of Color were promoted, while the four Caucasian employees were promoted at least two (2) positions above those of myself and the other Person of Color. Furthermore, I was not informed of certain in-house-training, necessary for promotion, whereas the other Caucasian employees participated in this in-house-training and received promotions. In May 2022 I contacted Athena Health's Diversity and Inclusion representative and informed her I had some issues and complaints about race-based training, promotions, and opportunities at Athena Health. Approximately two (2) weeks later I was terminated.</p> <p>III. I believe that I, and that class of present and former employees who did not receive opportunities for training and/or promotion despite working a similar position, were discriminated against based upon our race in violation of Title VII.</p>																												
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